

EXHIBIT A

Wroblewski, Karlee

From: Bo Davis <bdavis@davisfirm.com>
Sent: Tuesday, December 7, 2021 10:28 PM
To: Stevens, Scott; Christian Hurt; Ong, Andrew; Wroblewski, Karlee; Ty Wilson; Eric Findlay
Cc: Schuman, Brett; Larochelle, Christie; Kline, Douglas J; Brian Craft; Walsh, Rachel M.; Deron Dacus; Haynes, John; Rudy Fink; Michelle Button; Marais, Nic; TQDelta Listserv
Subject: Re: Proposed DCO & DO - TQ Delta v. CommScope & Nokia

EXTERNAL SENDER – Proceed with caution

Counsel,

We propose the following compromise on the outstanding discovery and docket control order issues:

Discovery Order:

1. Interrogatories – 50 for each party.
2. Requests for Admission – We propose the Court's default that there is no limit on the requests related to document authentication. Given the number of patents and issues in this case, we propose a compromise of 80 each.
3. Party deposition limits. TQD gets 90 hours each for each defendant. Defendants get 40 hours jointly and an additional 30 individually. We believe that there will be significant overlap in the issues that defendants wish to discover from TQD and that there should not be a separate deposition of TQD by each defendant on the same issues. We are open to suggestions on how to address this concern.
4. Third Party deposition limits – TQD gets 70 hours; CommScope gets 70 hours; Nokia gets 70 hours.
5. **Model Order Re Claim Narrowing and Reduction of Prior Art – we cannot agree to the eastern district model order. While we are open to discussing the issues related to narrowing the case for trial, given the upcoming deadlines to submit the DCO and DO, we propose that the parties continue to discuss this issue over the coming weeks.**

Docket Control Order:

1. TQD will agree to Jan 13 for defendants to comply with the Standing Order Re Subject-Matter Eligibility Contentions
2. TQD will agree to Jan 30 for the parties to Join Additional Parties

With those agreements on the DCO, I don't believe there are any outstanding disputes.

Please let me know whether you can agree to our proposals regarding the discovery order. If we need another call, I am available from 1:30 – 2:30 and after 5:30 (CDT) tomorrow.

Best,
BD

From: "Stevens, Scott" <Scott.Stevens@alston.com>
Date: Monday, December 6, 2021 at 2:35 PM
To: Christian Hurt <churt@davisfirm.com>, "Ong, Andrew" <AOng@goodwinlaw.com>, "Wroblewski, Karlee" <Karlee.Wroblewski@alston.com>, Bo Davis <bdavis@davisfirm.com>, Ty Wilson <twilson@davisfirm.com>, Eric Findlay <efindlay@findlaycraft.com>
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